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RULES CLEARINGHOUSE

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CLEARINGHOUSE RULE 98-200

Comments

[NOTE: All citations to “Manual” in the comments below are to the Administrative Rules Procedures Manual, prepared by the Revisor of Statutes Bureau and the Legislative Council Staff, dated September 1998.]

2. Form, Style and Placement in Administrative Code

a. The treatment clause of SECTION 1 should be on one line and the colon should be replaced by a period, i.e., “SECTION 1. VA 1.10 (7) is amended to read:”.

b. When sub. (7) of s. VA 1.10 is amended, the section number of the rule should be listed in the amendatory provision. Thus, after the treatment clause in SECTION 1 of the rule, “VA 1.10” should be inserted before “(7).”

c. Generally, periods are preserved in the material being amended. They are not stricken or underscored unless a new sentence is created or an old sentence is eliminated. Thus, in s. VA 1.10 (7), the underscored material should be inserted before the period after the word “loans.” Doing so would eliminate the need to strike one period and underscore another. [See s. 1.06 (4), Manual.]

5. Clarity, Grammar, Punctuation and Use of Plain Language

a. The analysis to the rule indicates that the loan information will be released to a party under contract with the state, “which would assure that the party maintain the confidentiality of the information.” This confidentiality requirement is not made explicit in the rule. Will the contracts require confidentiality? The source of this confidentiality protection should be better identified.

b. Presumably, the phrase “under contract with” also applies to the department of administration. This could be clarified by inserting “either” after “with” in the new material.